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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CASE NO. 19-11665-mdc
	:	
PANATIOTA G. GETSOS	:	Chapter 13
	:	
	:	
	:	

**OBJECTION OF KNOLLS OF BIRMINGHAM SINGLES ASSOCIATION TO
CONFIRMATION OF THE DEBTORS' CHAPTER 13 PLAN**

Movant, Knolls of Birmingham Singles Association (hereinafter referred to as "Movant"), by its attorneys, Marcus & Hoffman, P.C., hereby objects to confirmation of the Debtors' Chapter 13 Plan as follows:

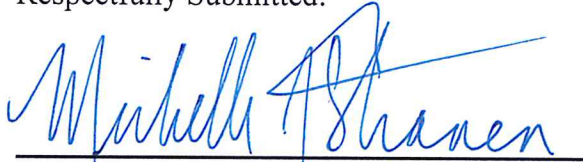
1. Movant is Knolls of Birmingham Singles Association.
2. Debtor, Panatiota G. Getsos, is the owner of the property located at 1341 Wooded Knolls, West Chester, PA 19382, located within the Knolls of Birmingham Singles Association.
3. On April 5, 2019, Movant filed a Proof of Claim listing pre-petition arrears in the amount of \$12,671.19. A copy of the Proof of Claim is attached hereto as Exhibit "A" and made a part hereof.
4. Debtors' Chapter 13 Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5).
5. It is unclear if Debtors' Chapter 13 Plan provides for payment of arrears to Movant. A copy of the Debtor's Chapter 13 Plan is attached hereto as Exhibit "B" and made a part hereof.

6. Movant objects to Debtors' Plan, unless it provides for full payment of arrears to Movant. Debtors' Plan should be amended to fully fund the arrears owed to Movant in the amount stated in Movant's Proof of Claim. Confirmation of Debtors' proposed Plan should be denied.

WHEREFORE, Knolls of Birmingham Singles Association respectfully requests that this Honorable Court deny confirmation of the Debtors' Chapter 13 Plan.

Dated: May 28, 2019

Respectfully Submitted:



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